



1. Nabors admits the allegations in Paragraph 1 of the Objection.
2. Nabors admits the allegations in Paragraph 2 of the Objection.
3. Sentence 1 of Paragraph 3 of the Objection is a statement of law and therefore requires no response. To the extent that a response is required, Nabors admits the allegations in sentence 1 of Paragraph 3 of the Objection. Nabors denies the remaining allegations in Paragraph 3 of the Objection.
4. Nabors denies the allegations in Paragraphs 4 through 5 of the Objection.
5. Paragraph 6 of the Objection requires no response.
6. To the extent that Paragraph 7 of the Objection is merely a prayer, no response is required. To the extent that Paragraph 7 of the Objection are allegations that the Debtors are entitled to specific relief, Nabors denies the allegations.

#### **FURTHER RESPONSE**

7. The validity of Nabors' lien which forms the basis of its claim is being determined in Adversary Proceeding No. 20-03125 (the "Adversary"). On June 18, 2020, Nabors filed its *Expedited Unopposed Motion for Entry of an Agreed Order to Consolidate Claim Objection with Adversary Proceeding* [Dkt. No. 149]. Nabors consents to entry of final orders or judgment by the bankruptcy court.

#### **CONCLUSION**

**WHEREFORE**, PREMISES CONSIDERED, Nabors respectfully requests that the relief requested in the Objection with respect to the creditor be denied in all respects and that the creditor receive such other and further relief to which it may be justly entitled to receive.

Dated: June 19, 2020

Respectfully submitted,

**DORÉ ROTHBERG MCKAY, P.C.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2020 a true and correct copy of the foregoing was served by the Court's Electronic Case Filing System to all parties registered or otherwise entitled to receive electronic notices.

/s/ Allyson Sasha Johnson  
Allyson Sasha Johnson